

Pollution Prevention Planning Requirements

Rule Requires Preparation of Pollution Prevention Plans

In 1990, the Legislature passed Chapter 70.95C RCW to establish state policies and goals that encourage the reduction of hazardous substance use and the generation of hazardous waste. The law achieves its goals by requiring certain hazardous waste generators and hazardous substance users to prepare plans for voluntarily reducing hazardous substance use and hazardous waste generation. Plans must consider management options based first on hazardous substance use and hazardous waste reduction, second on recycling, and third on treatment.

Ecology's pollution prevention planning law, Chapter 173-307 WAC, identifies the specific requirements for developing pollution prevention plans.

Pollution Prevention Planning Guidance

Ecology's *Pollution Prevention Planning Guidance Manual*, Publication #91-2, Revised 5/01, provides guidance to supplement the rule requirements. A set of worksheets is provided, which if completed according to the instructions, should result in an acceptable plan. The required planning elements include:

- ◆ A description of the facility, products made or services provided, levels of production or service activity, and a description of prior pollution prevention accomplishments.
- ◆ A policy statement that shows management and corporate support for the planning effort, plus a statement that risks will not be shifted to other environmental media.
- ◆ A description of employee training and involvement programs.
- ◆ A description of the cost accounting system used to identify hazardous substance use and hazardous waste management costs.
- ◆ An identification of hazardous substances used and hazardous waste generated.
- ◆ A description of processes used in the facility.
- ◆ An identification and evaluation of all reasonable opportunities for further reduction, recycling, and treatment activities.
- ◆ A list of opportunities selected for implementation, performance goals for the five year life of the plan, and an implementation schedule.

Ecology updated this guidance manual in 2001 to incorporate improvements based on a study of the effectiveness of the program's first ten years.

A Plan or Executive Summary Must be Submitted

The plan itself may remain at the facility, but it must be available for review by Ecology staff. Ecology must receive either a copy of the plan or an executive summary by the plan completion date.

Plan Due Dates

Facilities must file plans on September 1 of the year after the first year they become a hazardous substance user or hazardous waste generator, as defined in the pollution prevention planning law.

Annual Progress Reports are Required.

Each year, Ecology collects progress reports on September 1, following the due date of the plan. The progress report provides information on the progress made to implement the plan during the prior twelve month period.

Five-Year Updates are Required

Planning facilities must submit plan updates every five years. Plan updates are due on September 1 in the fifth year after the due date of the original plan.

Plan Review Process

Ecology staff may review plans, executive summaries, and annual progress reports to determine their adequacy. This determination will be based solely on whether the documents are complete and prepared according to the planning requirements. Ecology reviewers notify planners if any part of the document is not acceptable.

Environmental Management System Alternative

Ecology now offers a new more flexible alternative to planning for qualified facilities. A facility required to prepare a Pollution Prevention Plan or Five Year Plan Update may be able to meet these requirements by submitting documentation that they have an operating environmental management system (EMS) in place that meets a set of predefined pollution prevention criteria. ISO 14001 programs are one example of environmental management systems that may substitute for a plan, provided they meet the criteria.

Ecology is an equal opportunity agency. If you have special accommodation needs or require this document in an alternate format, please contact the Hazardous Waste and Toxics Reduction Program at (360) 407-6700 (Voice) or (360) 407-6006 (TDD).